



## LOUISVILLE METRO POLICE OFFICERS CREDIT UNION

April 2, 2009

Ms. Mary Rupp  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

**RE: ADVANCED NOTICE OF PROPOSED RULEMAKING (ANPR)  
TO 12 CFR PART 704**

Dear Ms. Rupp:

On behalf of the management and Board of Louisville Metro Police Officers Credit Union, I would like to comment on the recently issued Advance Notice of Proposed Rulemaking (ANPR) to 12 CFR Part 704.

Please let me begin by commending NCUA for allowing natural person credit unions the opportunity to express our thoughts on the corporate system as part of the evaluation process.

Louisville Metro Police Officers Credit Union is 10,000,000 in assets, has 2400 members, and serves the Metropolitan Police Department in Louisville, Kentucky, plus other law enforcement agencies throughout Jefferson County and the state of Kentucky.

We are currently members of Kentucky Corporate Federal Credit Union and use the following services from them: Daily Settlement, ACH Origination and Receipt, Domestic Wire Services, Line of Credit, Investments, SimpliCD Program, Check Collection, Coin and Currency, and BSA Training.

Kentucky Corporate is an integral part of our daily operations, aiding us in providing to our members many services that we alone could not provide. It would be too cost prohibitive for a small credit union like ours to attempt to offer many of the services we currently provide *because* of Kentucky Corporate FCU.

Kentucky Corporate FCU is invaluable to our credit union. We call them many times for assistance and guidance on issues we face day to day and they are always responsive to our needs.

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Whatever actions NCUA takes regarding the corporate system, please bear in mind that there are many credit unions, both small and large, depending on their Corporate FCU for their daily operational needs.

Additionally, however, please keep in mind the small credit unions that would be greatly affected if they lost the services of their corporate credit union. Small credit unions are the backbone of the credit union industry. Please keep these thoughts in mind when making a decision regarding the future of the corporate federal credit union system.

Thank you for your time and consideration and also for the opportunity to comment regarding this issue.

Sincerely,

**LOUISVILLE METRO POLICE OFFICERS  
CREDIT UNION**



Sondra G. Stivers,  
President/CEO

CC: Chairman Fryzel  
Vice Chairman Hood  
Board Member Hyland